

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKLYN DEVON PRILLERMAN

Plaintiff

v.

CITY OF PHILADELPHIA, ET AL.,

Defendant

CIVIL ACTION NO.

13-1414

JURY TRIAL DEMANDED

**FILED**

FEB 23 2016

MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

**ADDENDUM TO PLAINTIFF'S MOTION FOR RECONSIDERATION TO INCLUDE COMMISSIONER LOUIS  
GIORLA AS DEFENDANT IN CV13-1414**

In addition to assertions and facts put, forth in Plaintiff's MOTION FOR RECONSIDERATION OF PLAINTIFF'S MOTION TO AMEND COMPLAINT TO ADD LOUIS GIORLA; Plaintiff respectfully request that this Court consider the requirements of Pennsylvania Code Chapter 37 County Correctional Institutions, section 95.224(6) which reads as follows:

*"Written local policy must specify that inmate rules and staff procedures be reviewed by the prison administration on an annual basis. This review **must** determine if updates are necessary due to operational changes, **changes in the law, constitutional standards, or recognized professional standards.** The annual review and updates **shall** be documented."*

Commissioner Giorla was indifferent to the Codes promulgated by the Pennsylvania Supreme Court for the minimum standards for county jails and indifferent to the constitutional rights of others for whom he was responsible to protect.

Respectfully submitted:

  
Franklyn Prillerman, Pro se

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**CERTIFICATE OF SERVICE**

I, Franklyn Prillerman, do hereby certify that on this date a correct copy of Plaintiff's  
ADDENDUM TO PLAINTIFF'S MOTION FOR RECONSIDERATION TO ADD LOUIS GIORLA AS  
DEFENDANT IN THE INSTANT COMPLAINT. was sent via first class mail to:

Kristen Davis  
City of Philadelphia Law Department  
Civil Rights Unit  
1515 Arch St, 14<sup>th</sup> fl  
Philadelphia, PA 19102

Date: February 15, 2016

Respectfully submitted,

  
/s/ Franklyn D. Prillerman

123 E. Pomona St.

Philadelphia, PA 19144